

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

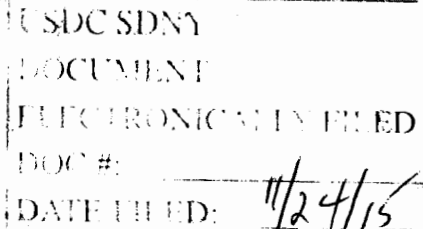
EURO PACIFIC CAPITAL INC, individually and in its
capacity as Investor Representative and attorney-in-fact
for BRUCE WALKER RAVENEL, et al.

Plaintiff,

vs.

BOHAI PHARMACEUTICALS GROUP, INC.,

Defendant.



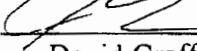
Index No.: 15-Civ-04410 (VM)

STIPULATION


IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned attorneys for their respective parties that the time for Defendant to submit its reply to Plaintiff's opposition [Doc. No. 23] to Defendant's Motion to Compel Arbitration [Doc. No. 18] is extended to and including December 4, 2015. The extension allows the parties time to conclude their ongoing mediation efforts.

Dated: New York, New York
November 23, 2015

ANDERSON KILL P.C.
Attorneys for Plaintiff

By: 
David Graff
Christopher L. Ayers
1251 Avenue of the Americas
New York, New York 10020
212-278-1000

DACHENG LAW OFFICES LLP
Attorneys for Defendant

By: 
Leodis C. Matthews
Eugene Meyers
2 Wall Street, 21st Floor
New York, NY 10005
212-380-8388

SO ORDERED: 

Victor Marrero
United States District Judge

www.dachenglaw.com

DaCheng Law Offices, LLP

2 Wall St, 21st Floor

New York, New York 10005

Tel: 1.212.380.8388

Fax: 1.212.810.1995



DACHENG
LAW
OFFICES

大成律师事务所

November 23, 2015

VIA FACSIMILE

Hon. Victor Marrero
United States District Court, Southern District of New York
Suite 660
United States Courthouse
500 Pearl Street
New York, New York 10007
(212) 805-6382

Re: Euro Pacific Capital Inc. v. Bohai Pharmaceuticals Group Inc.
Case No.: 15 Civ. 4410 (VM)

Dear Judge Marrero:

This office represents the defendant, Bohai Pharmaceuticals Group, Inc. ("Bohai"), in the above-referenced matter. On October 5, 2015, Bohai filed a motion to compel arbitration and dismiss certain claims pursuant to Rule 12(b)(6) [Doc. No. 18]. In order to determine whether the parties would voluntarily agree to arbitrate the dispute, the Court endorsed the parties' stipulation to allow additional time for the plaintiff, Euro Pacific Capital Inc. ("Euro Pacific"), to file an opposition to Bohai's motion [Doc. No. 21]. On November 16, 2015, Euro Pacific filed its opposition to Bohai's motion [Doc. No. 23].

By letter dated October 22, 2015, Euro Pacific notified the Court that the parties had not reached an agreement to proceed to arbitration, however, the parties had agreed to participate in mediation [Doc. No. 22]. The parties have participated in an initial mediation session and agreed to adjourn the next mediation session to allow time for Bohai to further consult with counsel. As a result of the emergency hospitalization of Bohai's lead counsel, Leodis C. Matthews, the mediation process has been briefly delayed.

In order to allow the parties additional time to conclude their mediation efforts and to determine whether this dispute may be resolved without further litigation expense, the parties have stipulated to extend the time for Bohai to reply to Euro Pacific's opposition brief to and including **December 4, 2015**. This is Bohai's first request for an extension of time to submit a reply to Euro Pacific's opposition brief. Euro Pacific has consented to the requested extension and an executed stipulation is enclosed herein.



DACHENG
LAW
OFFICES

大成律师事务所

Respectfully submitted,

DACHENG LAW OFFICES L.L.P.
*Counsel to Bohai Pharmaceuticals Group,
Inc.*



Eugene Meyers

2 Wall Street, Floor 21
New York, New York 10005
Tel: (212) 380-8388
Fax: (212) 810-1995
E-mail: Eugene.Meyers@dachenglaw.com

cc: Christopher Lewis Ayers (via facsimile)
(212) 278-1733

Enclosure